

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

STEPHEN McCOLLUM and SANDRA	§	
McCOLLUM, individually, and	§	
STEPHANIE KINGREY, individually and	§	
as independent administrator of the	§	
ESTATE OF LARRY GENE	§	
McCOLLUM,	§	
Plaintiffs,	§	
	§	
v.	§	CIVIL ACTION NO. 4:14-cv-03253
	§	
BRAD LIVINGSTON, et al.,	§	
Defendants.	§	

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**DEFENDANTS' JOINT UNOPPOSED MOTION FOR AN EXTENSION OF TIME  
OF THE DISPOSITIVE MOTION DEADLINE TO JUNE 17, 2016**

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The Defendants, University of Texas Medical Branch at Galveston, the Texas Department of Criminal Justice, and the individual defendants, file this joint unopposed motion for an extension of time of the dispositive motion deadline to June 17, 2016. In support thereof, the following is provided:

The deadline for dispositive motions is currently set for June 3, 2016. D.E. 277. The Defendants seek a fourteen (14) day extension which is unopposed.

Plaintiffs completed their last depositions in this case on April 27, May 6, and May 18, 2016, based on the parties' and the lawyers' availability. The extension will enable the parties to secure copies of the depositions, as well as provide adequate time to prepare the dispositive motions after those transcripts are received. This request is not sought for the purposes of delay, but so that justice may be done. In addition, this will benefit all the parties in light of the class certification hearing that begins in the *Bailey* matter next week.

**Conclusion**

Defendants respectfully requests the Court grant their motion seeking a fourteen day extension of the dispositive motion deadline extending the deadline to June 17, 2016.

Respectfully submitted,

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PRINGLE, RICHARD CLARK, KAREN TATE  
AND SANDREA SANDERS**

**CERTIFICATE OF CONFERENCE**

By my signature, I certify that Assistant Attorney General Cynthia Burton conferred with counsel for Plaintiffs, Scott Medlock, by email on May 20, 2016. Scott Medlock agreed to an extension of the dispositive motion deadline to June 17, 2016 with the proviso that the defendants would agree to reasonable extension requests by the Plaintiffs and, barring unforeseen circumstances, Defendants will not seek another extension of the dispositive motion deadline in the McCollum case.

/s/ J. Lee Haney

**J. LEE HANEY**

Assistant Attorney General

**NOTICE OF ELECTRONIC FILING**

I, **J. Lee Haney**, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing, a correct copy of the foregoing in accordance with the Electronic Case Files System of the Southern District of Texas, on May 20, 2016.

s/ J. Lee Haney  
**J. LEE HANEY**  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I, **J. Lee Haney**, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing has been served on all counsel of record via electronic mail on May 20, 2016, as authorized by Fed. R. Civ. P. 5(b)(2) and in accordance with the electronic case filing procedures of the United States District Court for the Southern District of Texas.

s/ J. Lee Haney  
**J. LEE HANEY**  
Assistant Attorney General